

To the Commission:

I am a licensed therapist with a Masters degree in clinical counseling. My practice areas include domestic cases resulting in abuse and violence perpetrated on family members. I understand that the Commission is considering changes in rules regarding telemarketing calls, specifically with regards to telemarketing calls that result in a "hang-up" call to a residence. I wish to point two disturbing consequences that can arise from this practice.

First, for persons with serious paranoia or thought disorders, such calls can trigger episodes of panic or rage, worsening preexisting conditions. These calls can play into delusional states, reinforcing an individual's delusional convictions of distrust and persecution.

Second, in a household with an abusive adult, such a call can result in violence against another household member. For example, a man or woman may suspect the hangup to be a paramour of spouse or partner, and the call then triggers an act of domestic violence. An emotionally unhealthy mother may believe a hangup is associated with a child's attempts to manipulate or challenge her authority, triggering an act of child abuse.

Emotional responses associated with paranoia and anger could be intensified when the caller-ID is blocked or otherwise indicates the calling party has taken steps to remain anonymous or untraceable.

While it is true that any hang-up calls, regardless of whether they are attributed to telemarketers or other sources such as a wrong number, could produce the above consequences, the statistical likelihood of such consequences increases proportionally with the volume of such calls. While we can't do much to reduce the frequency of misdialled calls and wrong numbers, it certainly seems feasible and desirable to limit those hang-up calls being made intentionally by commercial telemarketers. While this would not eliminate the existence of domestic violence or child abuse, it could make an impact by removing a nuisance and potential trigger of violence from our daily lives.

I understand from my research that telemarketers achieve some production efficiency, and thus a reduction in costs, by employing calling devices that result in these hang-up calls in some percentage of cases. I challenge the efficacy of a notion that an industry should be able to operate in such a way that can manifest real harms to people, just so the industry can save some money.

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